UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF NORTH CAROLINA Case No. 1:15-cv-00462-CCE-JLW

DANIELLE SEAMAN, individually and on behalf of all others similarly situated,

Plaintiff,

v.

DUKE UNIVERSITY and DUKE UNIVERSITY HEALTH SYSTEM, INC.

Defendants,

JOINT MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT

Plaintiff Danielle Seaman and Defendants Duke University and Duke University Health System (the "Parties") hereby respectfully request that the Court grant a limited extension until May 14, 2019 to file a motion to preliminarily approve the settlement in this matter. In support of this motion, the Parties state as follows:

- 1. The Parties informed the Court in a Telephone Conference on April 8, 2019 that they had reached a preliminary settlement in this matter. That same day, the Court entered a minute entry suspending all scheduling deadlines, cancelling the trial date, and stating that the motion for preliminary settlement approval was due by April 30, 2019.
- 2. Since the April 8 Telephone Conference, the parties have worked diligently to finalize the settlement terms and prepare the motion papers. Despite their diligence, the

parties require additional time to finalize the motion papers due to the length and complexity of those documents. Accordingly, the Parties request a brief extension of time until May 14, 2019 to file the motion for preliminary settlement approval. The parties will endeavor to file as soon as they are in a position to do so.

3. This filing is not made for the purpose of delay or any other improper purpose.

WHEREFORE, the Parties respectfully request that the Court enter an order extending their time to file the motion for preliminary settlement approval until May 14, 2019.

Respectfully Submitted,

Dated: April 29, 2019 /s/ Dean M. Harvey

Kelly M. Dermody*
Brendan P. Glackin*
Dean M. Harvey*
Anne B. Shaver*
Yaman Salahi*

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

275 Battery Street, 29th Floor San Francisco, CA 94111-3339 Telephone: (415) 956-1000

Facsimile: (415) 956-1008 kdermody@lchb.com dharvey@lchb.com ashaver@lchb.com ysalahi@lchb.com

*admitted pursuant to LR83.1(d)

Robert M. Elliot (State Bar No. 7709) ELLIOT MORGAN PARSONAGE, P.A.

426 Old Salem Rd.

Winston-Salem, NC 27101 Telephone: (336) 724-2828 Facsimile: (336) 714-4499

rmelliot@emplawfirm.com

Counsel for Plaintiff Dr. Seaman and the Class

WOMBLE BOND DICKINSON (US) LLP

/s/ Brent F. Powell

Brent F. Powell NC State Bar No. 41938 One West Fourth Street Winston-Salem, NC 27101 Telephone: (336) 721-3600

Facsimile: (336) 721-3660

Email: Brent.Powell@wbd-us.com

James P. Cooney, III
NC State Bar No. 12140
Sarah Motley Stone
NC State Bar No. 34117
One Wells Fargo Center
301 South College Street, Suite 3500
Charlotte, NC 28202

Telephone: (704) 331-4900 Facsimile: (704) 331-4955

Email: Jim.Cooney@wbd-us.com

Sarah.Stone@wbd-us.com

Gregg H. Levy*
Derek Ludwin*
Ashley Bass*
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, DC 20001
Telephone: (202) 662-6000
Facsimile: (202) 662-6291
glevy@cov.com
dludwin@cov.com

*admitted pursuant to LR83.1(d)

Counsel for Defendants Duke and DUHS